

## REMARKS

Claims 86 and 112-121 were pending and stand rejected. Claims 116 and 121 have been amended. Claims 86, 112-115, and 117-120 have been cancelled. New claims 122-137 have been added. Claims 116 and 121-137 are pending upon entry of this amendment.

### Claims 86, 112-115, and 117-120

Claims 86 and 117 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Grinstein in view of Unuma. Claims 112, 115, 118, and 120 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Grinstein. Claims 113-114 and 119 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Grinstein in view of Takakura and Saito.

Claims 86, 112-115, and 117-120 have been cancelled.

### Claims 116 and 121-137

Claims 116 and 121 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Grinstein. Applicant respectfully traverses in view of the amended claim.

On May 27, 2009, Examiner and Applicant had a telephonic interview during which they discussed claim 116 and Grinstein. No agreement was reached.

As amended, claim 116 recites:

In a computer-implemented animation system, a method for animating an object, the method comprising:

- receiving an input specifying a Random Motion behavior, the Random Motion behavior indicating how to change a value of a position parameter of the object over time based on a pseudo-random motion path;
- animating the object by changing the value of the position parameter of the object over time according to the Random Motion behavior; and
- outputting the animated object;

wherein the Random Motion behavior can be configured regarding:

- an amount parameter, which determines a length of the motion path;

a frequency parameter, which determines a crookedness of the motion path, wherein a higher value of the frequency parameter results in the motion path having more turns, and wherein a lower value of the frequency parameter results in the motion path being straighter;  
a noisiness parameter, which determines a level of jaggedness along the motion path; and  
a drag parameter, which determines a speed at which the object moves along the motion path.

As described in the pending application (¶¶689-700<sup>1</sup>; FIGS. 53-56), the Random Motion behavior affects an object's Position parameter (¶690). If a user applies the Random Motion behavior to an object, the behavior animates the position of the object and makes the object move around the Canvas along a pseudo-random path (¶690). FIG. 53 illustrates an object and a Random Motion motion path (¶690).

Note that the Random Motion behavior is not completely random. In one embodiment, the motion created with this behavior is actually affected by a particular group of parameters (¶691). As long as the parameters (and random seed number) don't change, the motion path created by the behavior will remain the same (¶691). In order to pseudo-randomly generate a different motion path, a Generate button can be clicked to pick a new random seed number. The new random seed number is then used to generate a new motion path, in conjunction with the group of parameters (¶691).

Claim 116 states that the Random Motion behavior can be configured using various parameters such as frequency. The frequency parameter determines a crookedness of the motion path. Applying the Random Motion behavior to an object causes the object to move along a particular motion path. This motion path is largely random (e.g., based on the seed number), but its crookedness can be configured by specifying a value for the frequency parameter. A higher value of the frequency parameter results in the motion path having more turns, and a lower value of the frequency parameter results in the motion path being straighter.

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<sup>1</sup> Paragraph citations are to the application as published.

Claim 116 recites, in part, “receiving an input specifying a Random Motion behavior, the Random Motion behavior indicating how to change a value of a position parameter of the object over time based on a pseudo-random motion path ... wherein the Random Motion behavior can be configured regarding: ... a frequency parameter, which determines a crookedness of the motion path, wherein a higher value of the frequency parameter results in the motion path having more turns, and wherein a lower value of the frequency parameter results in the motion path being straighter” (emphasis added).

Grinstein does not disclose, teach, or suggest this claimed element. Examiner argued that Grinstein disclosed this claimed element at Section 6.2.8.5 entitled Boundary Bounce (Detailed Action, page 8). The cited section defines a random wandering movement for a ball (38:37-38). The ball will have a constant speed but the velocity direction will vary randomly (38:38-39). In Grinstein’s API, this movement is defined by:

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BehaviorVar wander=(velocityControl(randomDir(simTime()))
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(39:40). It appears that the randomDir command uses the simulation time (returned by simTime()) as a seed number to determine a direction at random. The ball is then moved in that direction using the velocityControl command.

Since the randomDir command determines a direction at random (based on a seed number), the direction cannot be influenced in any way. In particular, Grinstein does not disclose, teach, or suggest being able to configure or constrain the movement direction in order to attain a particular level of crookedness for the resulting motion path. Grinstein also does not disclose, teach, or suggest a frequency parameter, wherein a higher value of the frequency parameter results in the motion path having more turns, and wherein a lower value of the frequency parameter results in the motion path being straighter.

It follows that Grinstein does not disclose, teach, or suggest the claimed element “receiving an input specifying a Random Motion behavior, the Random Motion behavior indicating how to change a value of a position parameter of the object over time based on a pseudo-random motion path ... wherein the Random Motion behavior can be configured regarding: ... a frequency parameter, which determines a crookedness of the motion path, wherein a higher value of the frequency parameter results in the motion path having more turns, and wherein a lower value of the frequency parameter results in the motion path being straighter.”

Therefore, claim 116 is patentable over Grinstein.

Independent claims 121-123, 128, and 133 recite similar language and are also patentable over Grinstein for at least the same reasons.

The claims not specifically mentioned above depend from their respective base claims, which were shown to be patentable over Grinstein. In addition, these claims recite other features not included in their respective base claims. Thus, these claims are patentable for at least the reasons discussed above, as well as for the elements that they individually recite.

Applicant respectfully submits that the pending claims are allowable over the cited art of record and requests that Examiner allow this case. Examiner is invited to contact the undersigned in order to advance the prosecution of this application.

Respectfully submitted,  
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